



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Central Valley Region

Steven T. Butler, Chair



Gray Davis
Governor

Sacramento Main Office

Internet Address: <http://www.swrcb.ca.gov/~rwqcb5>
3443 Routier Road, Suite A, Sacramento, California 95827-3003
Phone (916) 255-3000 • FAX (916) 255-3015

10 May 1999

To: Interested Parties

SUMMARY INFORMATION ON THE INTRODUCTORY MEETINGS ON THE SALT AND BORON BASIN PLAN AMENDMENT

Enclosed for your information is a summary handout on the introductory meetings that were held during April and May 1999 on the Basin Plan Amendment addressing salt and boron in the lower San Joaquin River. Side one of the handout briefly answers the five main questions discussed by staff during the presentation, while side two summarizes responses to some of the questions posed by participants.

We hope that you find the enclosed handout informative. Notification of future meetings will be provided as the times and locations are finalized. The information will be distributed through mailouts and also posted on our new web page specific to the salt and boron basin plan amendment. The web page may be accessed through the Regional Board home page at "www.swrcb.ca.gov/~rwqcb5/" under *News, Events, and Activities*.

If you would like to discuss the enclosed material, please contact Jeanne Chilcott at 916/255-3088 (Email: chilcoj@rb5s.swrcb.ca.gov) or Les Grober at 916/255-3091 (Email: groberl@rb5s.swrcb.ca.gov). Also, please notify us if you would like to be removed from this mailing list, have your address updated, or add additional interested parties to the current list.

Rudy Schnagl, Chief
Agricultural Regulatory and Planning Unit

Enclosure



Major Points Presented by Staff During Introductory Meetings on the Basin Plan Amendment Addressing Salt and Boron in the Lower San Joaquin River

Why is a Basin Plan Amendment for Salt and Boron necessary for the Lower San Joaquin River?

Current water quality objectives for both salt and boron are being exceeded in both the lower reach of the San Joaquin River and in the southern portion of the Sacramento-San Joaquin Delta. The exceedances indicate that beneficial uses are being impaired.

What is a Basin Plan Amendment?

A Basin Plan Amendment (BPA) is a change to the Basin Plan, the document that describes the actions the Regional Board will take to protect the beneficial uses of surface water and groundwater within the region. Every Basin Plan is comprised of three primary components: a listing of Beneficial Uses for the water body in question; the Water Quality Objectives (numerical and/or narrative) that will protect the most sensitive, and thus all, of the beneficial uses; and an Implementation Plan which lists the actions that will be taken to ensure that water quality objectives are met and beneficial uses protected. The amendment may change one or more of these three components.

What is the Basin Plan Amendment Process?

Since a BPA is a change to a regulatory document, a series of specific steps must be followed to incorporate the proposed amendment. These steps include but are not limited to:

- Development of a staff report that provides background information, discusses alternatives and recommends specific amendments. The report also addresses environmental impacts, mitigation measures, economics and other issues;
- Request for and evaluation of public comments (and written responses by staff to written public comments received a minimum of 15 days prior to a public hearing);
- Conducting a technical peer review of the proposed amendment;
- Holding a public hearing by the Regional Water Quality Control Board after which three things could happen:
 1. the proposed amendment could be adopted;
 2. a slightly modified amendment could be adopted; or
 3. staff could be directed to evaluate major modifications to the proposed amendment and schedule a future hearing.
- Approval by the State Water Resources Control Board and the Office of Administrative Law before an adopted amendment is incorporated into the Basin Plan.

Where are we today?

Staff is currently preparing the full BPA staff report. Since the issue of salt and boron control is so complicated, separate draft chapters for proposed water quality objectives and an implementation plan will be released separately for public review in June and August, respectively. The full staff report, which will incorporate comments received on the draft chapters, will be released in September. This final draft staff report will be the BPA that the Regional Water Quality Control Board will evaluate for adoption at a public hearing in December 1999.

What can interested parties do?

First, be sure that you are on our mailing list in order to receive information on upcoming events. Also, review the draft documents, discuss locally and provide consolidated comments. Begin evaluating now, whether or not there is enough local interest to form watershed management areas to coordinate local activities.

CONTACTS:

Harley Davis (916/255-3102)
"davish@rb5s.swrcb.ca.gov"

Rudy Schnagl (916/255-3101)
"schnagr@rb5s.swrcb.ca.gov"

Les Grober (916/255-3091)
"groberl@rb5s.swrcb.ca.gov"

Jeanne Chilcott (916/255-3088)
"chilcoj@rb5s.swrcb.ca.gov"

**Regional Board Web Site: "www.swrcb.ca.gov/~rwqcb5/"
(under: News, Events and Activities)**

Questions and Comments from Meeting Participants

Will the BPA change water quality objectives in the southern Delta?

No. The BPA is focusing on the lower San Joaquin River from the Mendota Dam to Vernalis (at Airport Way).

Why isn't the BPA addressing the Mendota Pool itself and the river upstream of the Pool?

No salt or boron impairment has been identified for the Medota Pool or the river upstream of the Pool.

How does a BPA for boron and salt fit into the Triennial Review process?

Former triennial reviews identified boron and salt in the lower San Joaquin River as a water quality concern needing a specific control plan. The current BPA is a result of that recognition. The triennial review completed in April 1999, also identified salt and boron control in the river as one of the top priority issues to be addressed by the CVRWQCB.

Are all potential sources of salt and boron being considered (point sources as well as nonpoint source)?

Yes. Point sources, such as municipal and industrial dischargers, are already under NPDES permits. Although these sources are being considered in the overall control program, available information indicates that the majority of the salt and boron loading is coming from nonpoint source discharges such as agricultural return flows, wetland releases and groundwater.

How did you measure groundwater loading?

Since there is no direct means of measuring groundwater salt and boron loads, a model was used to estimate groundwater contributions along various reaches of the lower SJR.

What about sources into the river during flood flows?

These sources have been considered as part of the historic review and are being evaluated as part of the seasonal load during wet years.

How will you deal with high sources of salt? For example, if we receive water at 1,000 $\mu\text{mhos/cm}$ and discharge at 1,100 $\mu\text{mhos/cm}$, how would we meet a lower objective?

Quality of source flows are being evaluated as part of the control plan, both in the reasonableness of meeting proposed objectives and the timeline necessary to come into compliance. One of the major issues being evaluated is how to ensure that the assimilative capacity of the river is not exceeded in the upstream reaches which would penalize downstream users and dischargers.

What about applying source (water supply) controls?

Controlling the amount of supply water is a water rights issue and is beyond the jurisdiction of the Regional Board. The Regional Board can only regulate discharges that impact water quality. If the concept of local control moves forward under watershed management programs, local agencies may wish to explore source control as one of many potential activities needed to meet water quality objectives within a given time frame.

How does the watershed approach work?

Staff are envisioning a process where local dischargers with like management practices and concerns form a local "watershed management entity". This entity would then propose activities to the Regional Board as part of a management plan designed to meet water quality objectives within a given time frame. The management plan may then be approved by the Regional Board--ensuring that both parties understand what has been agreed to over the long term.

Districts may not have the legal power to enforce control of discharges.

This is an issue that needs to be determined locally. Many water agencies have wrestled with this concept in terms of maintenance of drains when excess sediment loads have been discharged. However, if a district allows a waste discharge into its system, the district assumes responsibility for that discharge. Staff recognizes that changes in management will take time and is considering this factor as the implementation program is developed.

What about TMDLs?

Development of a TMDL (total maximum daily load) is a federal requirement for any constituent which causes a water body to be identified as impaired on the federal 303(d) listing.

A standard TMDL allocates loads of the constituents to various sources in order to ensure that water quality objectives will be met. Normally the loads are allocated to NPDES point source dischargers, nonpoint source dischargers and background sources. In the case of salt and boron, the primary sources are nonpoint, so staff envisions a process which proposes the allocation of loads to various subwatershed areas, rather than to specific point sources

How does the watershed approach work with real-time management?

Real-time management is a concept that would allow responses to a dynamic system in order to balance fresh water releases with saline discharges. With real time management in place, the full assimilative capacity of the river could be utilized while still meeting water quality objectives.

If you allow increasing salt loads to the river, and the river basically recirculates into the basin through the DMC when the pumps are on, how will salt buildup in the soil be prevented?

The control program is expected to result in a net reduction in the salt load carried by the river. Real time management would balance remaining saline discharge with freshwater inflows to insure that water quality objectives are met. Part of the solution to preventing salt buildup in the soil includes determining the correct water quality objective to protect irrigation water supply and proper field management. Salt buildup is a complex issue that staff hopes to receive public input on during the review process.

What about secondary impacts of the BPA on east-side tributaries and upstream beneficial uses (if extra releases are required to meet objectives downstream)?

This is a water rights issue which is beyond the jurisdiction of the Regional Board. The Board can not require releases, and must control discharges to ensure that objectives are met under all flow conditions.